

# EXHIBIT B

# Safeguarding your data

This article summarizes Google Analytics' data practices and commitment to protecting the confidentiality and security of data. Visitors to sites or apps using Google Analytics (aka "users") may learn about our end user controls.

Site or app owners using Google Analytics (aka "customers") may find this a useful resource, particularly if they are businesses affected by the European Economic Area's General Data Protection Regulation, or California's California Consumer Privacy Act. See also the Google privacy policy and Google's site for customers and partners.

## Information for Visitors of Sites and Apps Using Google Analytics

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### Our privacy policy

At Google, we are keenly aware of the trust you place in us and our responsibility to keep your privacy and data secure. As part of this responsibility, we let you know what information we collect when you use our products and services, why we collect it, and how we use it to improve your experience. The Google privacy policy & principles describes how we treat personal information when you use Google's products and services, including Google Analytics.

### Google Analytics cookies and identifiers

Google Analytics mainly uses first-party cookies to report on visitor (aka. user) interactions on Google Analytics customers' websites. Users may disable cookies or delete any individual cookie. [Learn more](#)

In addition, Google Analytics supports an optional browser add-on that - once installed and enabled - disables measurement by Google Analytics for any site a user visits. Note that this add-on only disables Google Analytics measurement.

Where a site or app uses Google Analytics for Apps or the Google Analytics for Firebase SDKs, Google Analytics collects an app-instance identifier — a randomly generated number that identifies a unique installation of an App. Whenever a user resets their Advertising Identifier (Advertising ID on Android, and ID for Advertisers on iOS), the app-instance identifier is also reset.

Where sites or apps have implemented Google Analytics with other Google Advertising products, like Google Ads, additional advertising identifiers may be collected. Users can opt-out of this feature and manage their settings for this cookie using the Ads Settings. [Learn more](#)

Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the service, and to give website owners a sense of which country, state, or city in the world their users come from (also known as "IP geolocation"). Google Analytics provides a method to mask IPs that are collected (detailed below) but note that website owners have access to their users' IP addresses even if the website owners do not use Google Analytics.

## Information for Sites and Apps Using Google Analytics

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### Google Analytics under the General Data Protection Regulation (GDPR)

Google operates as a data processor for Google Analytics. This is reflected in our Ads Data Processing Terms, which are available to all Google Analytics customers with direct contracts with Google. [Learn more](#)

Google Analytics is a data processor under GDPR because Google Analytics collects and processes data on behalf of our clients, pursuant to their instructions. Our customers are data controllers who retain full rights over the collection, access, retention, and deletion of their data at any time. Google's use of data is controlled by the terms of its contract with Google Analytics customers and any settings enabled by customers through the user interface of our product.

### Google Analytics under the California Consumer Privacy Act (CCPA)

In order to help Google Analytics customers prepare for the CCPA, we have updated our Data Processing Terms to include a CCPA service provider addendum. Subject to the full terms of this addendum, Google Analytics will act as a

service provider to its customers (when data sharing with Google products and services is disabled) and as such, will only use data collected on behalf of the customer in Google Analytics to provide the Google Analytics services. Customers who have not accepted our Data Processing Terms can do so per these instructions. Customers who have already agreed to our Data Processing Terms will not need to take additional action to accept the CCPA service provider addendum. Customers should review the CCPA service provider addendum, as well as Google Analytics' use of data, to ensure it meets customer's compliance needs.

To help customers manage their compliance needs, Google Analytics offers a collection of tools, detailed below, that enable you to control how data is collected, and whether it is used for advertising personalization.

If you have linked Google Analytics to another product, please refer to Google Analytics linking overview.

## Google Analytics under the Lei Geral de Proteção de Dados (LGPD)

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Google Analytics is a data processor under LGPD because Google Analytics collects and processes data on behalf of our clients, pursuant to their instructions. Our customers are data controllers who retain full rights over the collection, access, retention, and deletion of their data at any time. Google's use of data is controlled by the terms of its contract with Google Analytics customers and any settings enabled by customers through the user interface of our product.

## International transfers

The GDPR requires companies to meet certain conditions before transferring personal data outside the EEA, Switzerland and the UK. To comply with this requirement, Google relies on Standard Contractual Clauses for relevant data transfers in our Ads and measurement products.

We are committed to having a lawful basis for data transfers in compliance with applicable data protection laws.

## Data Collected by Google Analytics

## First-party Cookies

Google Analytics collects first-party cookies, data related to the device/browser, IP address and on-site/app activities to measure and report statistics about user interactions on the websites and/or apps that use Google Analytics. Customers may customize cookies and the data collected with features like cookie settings, User-ID, Data Import, and Measurement Protocol. [Learn more](#)

Google Analytics customers who have for instance, enabled the analytics.js or gtag.js collection method can control whether or not they use cookies to store a pseudonymous or random client identifier. If the customer decides to set a cookie, the information stored in the local first-party cookie is reduced to a random identifier (e.g., 12345.67890).

For customers who use the Google Analytics for Apps SDK, we collect an App Instance Identifier, which is a number that is randomly generated when the user installs an app for the first time.

## Advertising identifiers

Where customers use Google Analytics Advertising Features, Google advertising cookies are collected and used to enable features like Remarketing on the Google Display Network. These features are subject to the users' Ads Settings, the Policy requirements for Google Analytics Advertising Features and Google's EU User Consent policy, which requires customers to obtain consent for cookies where legally required—including consent for personalized ads. For more information about how Google uses advertising cookies, visit the [Google Advertising Privacy FAQ](#). It is possible to implement Google Analytics without affecting normal data collection where Advertising features are disabled until consent is obtained (see Privacy Controls in Google Analytics), as well as prevent certain data from being used for advertising personalization purposes (See Advertising Personalization below).

## IP Address

Google Analytics uses IP addresses to derive the geolocation of a visitor, and to protect the service and provide security to our customers. Customers may apply IP masking so that Google Analytics uses only a portion of an IP address collected, rather than the entire address. In addition, customers can override IPs at will using our IP Override feature.

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Document 82-3 Filed 02/04

Document 82-3 Filed 02/04

Document 82-3 Filed 02/04

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Document 82-3 Filed 02/04

Document 82-3 Filed 02/04

Document 82-3 Filed 02/04

Customers may pull event information for any given user identifier via our User Explorer report or the User Activity API. These features enable customers to analyze and export event level data for a single user identifier. In addition, our 360 customers may integrate with BigQuery to create a full export of all event data associated with their users in a single queryable repository.

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## Advertising Personalization

Customers may choose to limit use of their analytics data for advertising personalization purposes, instead of disabling the collection of all analytics data or advertising identifiers (see “Privacy Controls in Google Analytics”). For example, a customer may choose to enable Google signals to better understand how many unique users visit their website across devices, but restrict such data from being exported for remarketing into a linked ads account, such as Google Ads. Customers may choose to disable Advertising Personalization for data collected from their entire property, or to disable it for individual events or users (for apps, websites, and measurement protocol). Customers using Google Analytics for Firebase or Google Analytics 4 properties may also exclude specific events or user properties (like ‘purchase’ or ‘gender’) from being used for Ads Personalization.

If any of 1) all property-level data, 2) individual events, or 3) specific event names or user properties have been excluded from ads personalization, then Analytics will append an additional signal (called ‘npa’) in Postbacks indicating that networks should not use the data for personalized advertising. Note that each network's treatment of such ‘npa’ signal is determined by such network.

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## Data privacy and security

### Certifications

#### ISO 27001

Google has earned ISO 27001 certification for the systems, applications, people, technology, processes, and data centers serving a number of Google products, including Google Analytics. Learn more about our ISO compliance, and download our certificate (PDF) or learn more about ISO 27001.

#### Information security

In web-based computing, security of both data and applications is critical. Google dedicates significant resources towards securing applications and data handling to prevent unauthorized access to data.

Data is stored in an encoded format optimized for performance, rather than stored in a traditional file system or database manner. Data is dispersed across a number of physical and logical volumes for redundancy and expedient access, thereby obfuscating it from tampering.

Google applications run in a multi-tenant, distributed environment. Rather than segregating each customer's data onto a single machine or set of machines, data from all Google users (consumers, business, and even Google's own data) is distributed among a shared infrastructure composed of Google's many homogeneous machines and located in Google's data centers.

In addition, Google Analytics ensures secure transmission of its JavaScript libraries and measurement data. Google Analytics by default uses HTTP Strict Transport Security (HSTS), which instructs browsers that support HTTP over SSL (HTTPS) to use that encryption protocol for all communication between end users, websites, and Google Analytics servers. Learn more

#### Operational security and disaster recovery

To minimize service interruption due to hardware failure, natural disaster, or other catastrophe, Google implements a comprehensive disaster-recovery program at all of its data centers. This program includes multiple components to eliminate single points of failure, including the following:

**Data replication** To help ensure availability in the event of a disaster, Google Analytics data stored in Google's distributed file system is replicated to separate systems in different data centers.

**Geographical distribution of data centers** Google operates a geographically distributed set of data centers that is designed to maintain service continuity in the event of a disaster or other incident in a single region.

**Resilient and redundant infrastructure** Google's computing clusters are designed with resiliency and redundancy in mind, helping minimize single points of failure and the impact of common equipment failures and environmental risks.

**Continuity plan in the event of disaster** In addition to the redundancy of data and regionally disparate data centers, Google also has a business-continuity plan for its headquarters in Mountain View, CA. This plan accounts for major disasters, such as a seismic event or a public-health crisis, and it assumes people and services may be unavailable for up to 30 days. This plan is designed to enable continued operations of our services for our customers.

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